

Beth E. Levine, Esq.  
Andrew W. Caine, Esq. (admitted *pro hac vice*)  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34th Floor  
New York, New York 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
blevine@pszjlaw.com  
acaine@pszjlaw.com

*Counsel to Plaintiff, Robert Michaelson, in his capacity as  
Trustee of the International Shipholding GUC Trust*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

INTERNATIONAL SHIPHOLDING  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

ROBERT MICHAELSON, in his capacity as  
TRUSTEE OF THE INTERNATIONAL  
SHIPHOLDING GUC TRUST,

Plaintiff,

v.

BUCK KREIHS MARINE REPAIR L.L.C.,

Defendant.

Chapter 11

Case No. 16-12220 (SMB)

(Jointly Administered)

Adv. Proc. No. 18-01589 (SMB)

**STIPULATION FOR EXTENSION OF TIME TO  
ANSWER COMPLAINT OR OTHERWISE RESPOND**

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: International Shipholding Corporation (9662); Enterprise Ship Co. (9059); Sulphur Carriers, Inc. (8965); Central Gulf Lines, Inc. (8979); Coastal Carriers, Inc. (6278); Waterman Steamship Corporation (0640); N.W. Johnsen & Co., Inc. (8006); LMS Shipmanagement, Inc. (0660); U.S. United Ocean Services, LLC (1160); Mary Ann Hudson, LLC (8478); Sheila McDevitt, LLC (8380); Tower LLC (6755); Frascati Shops, Inc. (7875); Gulf South Shipping PTE LTD (8628); LCI Shipholdings, Inc. (8094); Dry Bulk Australia LTD (5383); Dry Bulk Americas LTD (6494); and Marco Shipping Company PTE LTD (4570).

Plaintiff and Defendant, each by and through their respective undersigned attorney, hereby stipulate and agree to extend the time for Defendant to answer, move or otherwise respond to Plaintiff's complaint as provided for herein:

1. On July 23, 2018, Plaintiff filed a complaint against Defendant.
2. The summons was issued by the Clerk's Office on July 24, 2018.
3. On July 24, 2018, Defendant was served with the summons and complaint.
4. Defendant does not challenge personal jurisdiction and waives any objection to service of process of the Summons and Complaint in this adversary proceeding.
5. Defendant does not waive any other defenses, objections or challenges which it may bring in this action other than as expressly stated in the previous paragraph.

**WHEREFORE**, the parties agree that the time by which Defendant is required to answer, move or otherwise respond to the Complaint is hereby further extended through and including October 24, 2018.

*[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]*

Dated: September 24, 2018

**PACHULSKI STANG ZIEHL & JONES LLP**

Counsel to Plaintiff, Robert Michaelson, in his  
capacity as Trustee of the International  
Shipholding GUC Trust

Dated: September 24, 2018

**SMITH KANE HOLMAN, LLC**

Counsel for Buck Kreihs Marine Repair L.L.C.

By: /s/ Beth E. Levine

Beth E. Levine, Esq.  
Andrew W. Caine, Esq. (admitted  
*pro hac vice*)  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017  
Tel.: (212) 561-7700  
Fax: (212) 561-7777  
Email: [blevine@pszjlaw.com](mailto:blevine@pszjlaw.com)  
[acaine@pszjlaw.com](mailto:acaine@pszjlaw.com)

By: /s/ Robert M. Greenbaum

Robert M. Greenbaum, Esq. (*pro hac vice*  
admission pending)  
112 Moores Road, Suite 300  
Malvern, PA 19355  
Telephone: (610) 407-7216  
Facsimile: (610) 407-7218  
Email: [rgreenbaum@skhlaw.com](mailto:rgreenbaum@skhlaw.com)

Dated: **September 28<sup>th</sup>, 2018**  
New York, New York

**/s/ STUART M. BERNSTEIN**

HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE